

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Kevin M. Flannery	:	Chapter 13
Catherine A. Flannery	:	
	:	
Debtor	:	Case No.: 18-15727 AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about August 29, 2018.
2. The Chapter 13 filing was assigned case number 18-15727 AMC.
3. On or about January 16, 2019, the Debtors' Chapter 13 Plan was confirmed by this Honorable Court.
4. After confirmation, Debtor 1, Kevin M. Flannery, received life insurance proceeds from the death of his father in the amount of \$34,541.02.
5. The Debtor used his full portion of the exemptions provided under 11 U.S.C. § 522(d)(5) and 11 U.S.C. § 522(d)(8). Please see attached Amended Schedule C marked as "**Exhibit A**" and incorporated herein.
6. Nonetheless, \$8,816.02 of the proceeds received remains unexempt.
7. The Debtors by and through Counsel have drafted a proposed modified plan to reflect the change in the amount that the unsecured creditors are entitled to. Please see attached proposed modified plan marked as "**Exhibit B**" and incorporated herein.
8. This modified Chapter 13 Plan is feasible and will allow the Debtors to remain financial stable, and payback all creditors in their case.

WHEREFORE, the Debtors request that they be permitted to modify their
Chapter 13 Plan for the above stated reasons.

Dated: May 18, 2021

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107